

# JASINSKI

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March 30, 2021

**Via CM/ECF**

Honorable Edward S. Kiel, U.S.M.J.  
United States District Court  
District of New Jersey  
Frank R. Lautenberg U.S. Post  
Office & Courthouse Building  
2 Federal Square  
Newark, NJ 07102

**Re: Scalia v. 300 Broadway Healthcare, L.L.C., et al 2:20-00622-CCC-ESK**

Dear Judge Kiel:

This firm represents Defendant Steve Kleiman and Defendant New Vista in the above referenced matter. Please accept this request for a two-week extension of the 60-day deadline to file the papers necessary to dismiss this action under F.R.C.P. 41.

The parties are extremely close on agreeing to the terms of the Consent Agreement, however due to the holidays counsel has to reconvene with their clients prior adopting the final agreement.

With the Courts permission it is respectfully requested that the parties be permitted to file their Consent Agreement by no later than April 21, 2021.

We thank Your Honor for your time and consideration.

SO ORDERED

Respectfully submitted,

s/Claire C. Cecchi

JASINSKI, P.C.

Claire C. Cecchi, U.S.D.J.

s/ Robert P. Manetta

Date: 4/6/2021

ROBERT P. MANETTA